

## REMARKS

As a preliminary matter, Applicants note that Amendment B, filed January 12, 2004, has not been entered. The present amendments to the claims, as well as the discussion below therefore, are based upon the status of the claims and prosecution following Amendment A, filed June 19, 2003.

Claims 1 and 5 stand rejected under 35 U.S.C. 102(e) as being anticipated by Holzle et al. (U.S. 6,209,066). Applicants respectfully traverse this rejection because the cited reference does not disclose (or suggest) an interface area that is dynamically allocated for a non-master thread, as in claims 1 and 5 of the present invention, as amended.

Holzle discloses a multi-thread system 300, which includes a shared memory allocation area 302. (See col. 7, lines 32-33). And, although Holzle does not specifically describe dynamic memory allocation for the system 300, Holzle refer to dynamic memory allocation for a computer system in general. (See col. 1, lines 17-19). Applicants note, however, that the system 300 disclosed by Holzle addresses memory allocation only for a master thread. Applicants submit that Holzle entirely fails to teach nor suggest any constitution that shows an interface area that is dynamically allocated for a thread other than the master thread, namely, a non-master thread.

In contrast, claims 1 and 5 of the present invention have been amended to recite, among other things, that an interface area is dynamically allocated for a non-master thread. In other words, the present invention has been clarified to feature that the interface

area at issue is allocated for the non-master thread which is processed in parallel to the master thread. As discussed above, Applicants again submit that Holzle neither teaches nor suggests any such constitution. Accordingly, for at least these reasons, the Section 102 rejection of claims 1 and 5 based on Holzle is respectfully traversed.

Claims 2-4 and 6-8 stand rejected under 35 U.S.C. 103(a) as being unpatentable over C: The Complete Reference, 3<sup>rd</sup> Ed., Herbert Schildt (1995), in view of Holzle. Applicants respectfully traverse this rejection because neither of the cited references, whether taken alone or in combination, discloses or suggests a compiler device (or medium with a compiler program) having both an interface area that is dynamically allocated for a non-master thread, and a feature that the interface area is allocated when one of the threads is processed, as in independent claims 2 and 6 of the present invention, as amended.

As discussed above, Applicants submit that Holzle fails to teach or suggest dynamic memory allocation of a non-master thread processed in parallel to the master thread. Additionally, claims 2 and 6 have been further amended to recite, among other things, that the interface area is allocated *when* a thread is processed. Applicants submit that Holzle further fails to teach or suggest these features of the present invention as well, namely, either when or for what thread any memory allocation area is allocated.

Schildt is cited by the Examiner merely for suggesting a code for determining the leading address. Schildt, however, fails to teach or suggest dynamic memory allocation for parallel non-master threads other than the master thread, in addition to its failure to teach

or suggest when, or for what thread, memory allocation areas are allocated. Because claims 2 and 6 of the present invention now more clearly recite such features, this Section 103 rejection based on a combination of Holzle and Schildt is respectfully traversed.

For all of the foregoing reasons, Applicants submit that this Application, including claims 1-8, is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

Respectfully submitted,

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A handwritten signature in black ink, appearing to read "Josh C. Snider", with a stylized flourish at the end.

Josh C. Snider

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